

# EXHIBIT 20

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VIA ELECTRONIC MAIL

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Re: *Spencer, et al. v. Lunada Bay Boys, et al.*

Dear Counsel:

We are in receipt of your recent production and write to advise you of the following deficiencies, which we intend to raise with Magistrate Judge Oliver:

1. The production is heavily redacted, but Defendants Charlie and Frank Ferrara waived any right they may have had to assert any privilege. Moreover, no privilege or redaction log was produced in conjunction with the production. Accordingly, all redactions are inappropriate.
2. It appears the production only contains Frank Ferrara's cell phone bills and text messages, though it is difficult to ascertain due to the significant redactions. To the extent the production omits Charlie Ferrara's cell phone bills and text messages entirely, such an omission is in violation of the Court's order.
3. The production only contains Frank Ferrara's cell phone bills from February 21, 2016 to present, but the document request sought his bills from January 1, 2013 to present. Thus, it appears that over three years' worth of bills are missing from this production.
4. Sang Lee's privilege log references text communications with Frank and/or Charlie Ferrara from 3/30/16-4/12/16, 4/14/16-5/6/16, 6/18/16-7/6/16, and 7/6/16-7/30/16. Yet it appears that no such text messages were included in the production by either Frank or Charlie Ferrara.

We will advise the court of these deficiencies and seek appropriate remedies.

Very truly yours,

A handwritten signature in cursive script, appearing to read "S. Wolff", written in black ink.

Samantha Wolff

SDT  
cc: All Counsel

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